

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 12 CASES LISTED IN  
EXHIBIT A TO PLAINTIFFS' NOTICE  
OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF PRIOR RESPONSE IN OPPOSITION TO  
DAUBERT MOTION TO EXCLUDE EXPERT TESTIMONY OF  
BRUCE S. KAHN, M.D. FOR WAVE 12**

In response to Plaintiffs' notice adopting their prior Wave 11 *Daubert* motion, memorandum, and reply as to Bruce S. Kahn, M.D. (ECF Doc. No. 8723 (adopting ECF Doc. Nos. 8565 – motion; 8566 – memorandum in support; and 8660 - reply)), Defendants hereby adopt and incorporate by reference their *Daubert* response as to Bruce S. Kahn, M.D. for Ethicon Wave 11 (Doc. No. 8643). Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 11 response briefing.

This notice applies to the Wave 12 cases identified in Plaintiffs' Exhibit A.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage

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